

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

GABRIELLE K. PASQUALETTI, as )	
Special Administrator for the )	
Estate of KRYSTEN MISCHELLE )	
GONZALEZ, deceased, )	
)	
Plaintiff, )	
)	
vs. )	CASE NO. CIV-21-0011-F
)	
SHERIFF TOMMIE JOHNSON, III, )	
in his official capacity; )	
P. D. TAYLOR, individually; )	
and TURN KEY HEALTH CLINICS, )	
LLC, )	
)	
Defendants. )	

VIDEOTAPED DEPOSITION OF SANDRA JEAN ZOSKI  
TAKEN ON BEHALF OF THE PLAINTIFF  
ON DECEMBER 7, 2023, BEGINNING AT 9:54 A.M.  
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY: KERRI L. WOOD, CSR

1 APPEARANCES

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GABE PACK

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## 15 STIPULATIONS

16 It is stipulated that the videotaped  
17 deposition of SANDRA JEAN ZOSKI may be taken on  
18 December 7, 2023, pursuant to Notice and Agreement  
19 and in accordance with the Federal Rules of Civil  
20 Procedure, before Kerri L. Wood, CSR. It is further  
21 stipulated that an objection by counsel for one  
22 Defendant is an objection for all Defendants.

23

24

25

1 (9:54 a.m.)

2 THE VIDEOGRAPHER: This is the  
3 videotaped deposition of Sandra Zoski in the matter  
4 of Pasqualetti, et al. versus Johnson, et al. This  
5 deposition's being held at 6301 Waterford Boulevard  
6 in Oklahoma City, Oklahoma, on December 7th, 2023.  
7 We are on the record at 9:54 a.m.

8 Will counsel please state your appearances  
9 for the record.

10 MR. FRANSEEN: Derek Franseen on behalf  
11 of the Plaintiffs.

12 MR. NARENDRAN: Anamayan Narendran on  
13 behalf of Turn Key.

14 MS. REMILLARD: Carri Remillard on  
15 behalf of Sheriff Tommie Johnson, III.

16 THE VIDEOGRAPHER: Okay. The court  
17 reporter will now swear in the witness.

18 SANDRA JEAN ZOSKI,  
19 being first duly sworn, deposes and says in reply  
20 to the questions propounded as follows:

21 \* \* \* \* \*

22 DIRECT EXAMINATION

23 BY MR. FRANSEEN:

24 Q Would you please state your full name for  
25 the record.

1 A Sandra Jean Zoski.

2 Q And have you ever gone by a different last  
3 name while you were practicing as a nurse?

4 A No.

5 Q Do you have a -- do you have a maiden name,  
6 or have you ever gone by another name?

7 A Yes. My name was Sandra Condit, to begin  
8 with. Then I married Zoski. Then I married  
9 Doug Pearson, Gary Deaton, and then back to Zoski.

10 Q Okay. I'd ask you to spell those names just  
11 so if we look them up, we can have them correct.  
12 So, we have Condit. How do you spell Condit?

13 A C-o-n-d-i-t.

14 Q And then Pearson was the next one?

15 A P-e-a-r-s-o-n.

16 Q And then Deaton?

17 A D-e-a-t-o-n.

18 Q Thank you.

19 And Zoski is Z-o-s-k-i?

20 A Yes, sir.

21 Q Can you briefly tell me what led to your  
22 journey to become an LPN?

23 A I had three kids, got a divorce, had to make  
24 a living for my kids. So, I decided I wanted to be  
25 a nurse and do that.

1 Q What year did you start nursing training?

2 A Two thousand and -- I mean, 1983.

3 Q And did you start off to become an LPN, or  
4 did you go through different levels?

5 A No. I worked in a nursing home maybe  
6 six months, as a aide.

7 Q And then you achieved your LPN license?

8 A Yes, sir.

9 Q And prior -- or when did you start working  
10 for Turn Key medical?

11 A I think it was 2006, around there.

12 Q Was that here in Oklahoma?

13 A Yes, sir.

14 Q What facility did you start at?

15 A Cleveland County.

16 Q Prior to working with Turn Key medical, did  
17 you have any other experience in a correctional  
18 facility?

19 A Yes, sir.

20 Q Where at?

21 A At LARC, Lexington Assessment and Receiving  
22 (sic) Center.

23 Q And that's a re- --

24 A In Okla- --

25 Q -- in -- in Lexington, and it's a

1     DOC center?

2           A     Yes, sir.

3           Q     And, for the record, "DOC" is "Department of  
4     Corrections" through --

5           A     Yes.

6           Q     -- the State.

7           A     Yes, sir.

8           Q     Have you ever been asked by Turn Key to  
9     evaluate their nursing assessments or mental health  
10    assessments?

11          A     Yes, sir.

12          Q     When -- when have you been asked to assist  
13    with that?

14          A     Well, we do it all the time. That's part of  
15    our job -- is to assess them.

16          Q     Yeah. And, so, part of one -- one of your  
17    job duties is to provide the mental health  
18    assessments.

19          A     We do some of them. If they bring a person  
20    in, we assess them if -- if mental health is not  
21    there.

22          Q     And, so, the policy is for mental health to  
23    provide the assessments if they're there.

24          A     Yes, sir.

25          Q     And if mental health is not there, then an



1 LPN or some other nurse provides that assessment?

2 A Yes, sir.

3 Q What if an LPN -- is there always an LPN  
4 on-site?

5 A Yes, sir.

6 Q How often is mental health on-site?

7 A Monday through Friday.

8 Q What hours?

9 A I think it's 8:00 to 4:00, something like  
10 that.

11 Q And are we referring to the same schedule  
12 and assignments that would be at Oklahoma County  
13 Detention Center?

14 A Yes, sir.

15 Q And would those be the same assignments that  
16 would have been in effect in 2019?

17 A Yes, sir.

18 Q Prior to working at LARC -- or, I guess,  
19 while you were at LARC, did you provide any mental  
20 health assessments?

21 A Yes, sir.

22 Q And can you explain to me what type of  
23 assessments you would perform at LARC?

24 A They would bring them into our clinic. We  
25 have a clinic there. And we'd -- they bring them

1 in, and we would talk to them if there wasn't a  
2 psych person around. And then we would send them to  
3 SP1 which they would take them down to "SHU" -- is  
4 what they call it in a prison.

5 Q And that would be if someone has a -- a  
6 mental health complaint?

7 A If they were suicidal or going to hurt  
8 themselves or hurt somebody else.

9 Q What if someone had a past history of  
10 suicidal behavior?

11 A It would be in their chart, and we would  
12 kind of go from there by that.

13 Q When you were at Lexington, did you have any  
14 specific floors for mental health patients -- or  
15 areas, I believe?

16 A Not that I remember. I don't think so.

17 Q Do you know if there'd been any changes  
18 since 2006 as Lexing- -- Lexington related to  
19 mental --

20 A I --

21 Q -- health?

22 A -- haven't been back there for a while.

23 Q Did you receive training, when you became  
24 a LPN, in mental health assessments?

25 A No, sir.

1           Q     Do you know anything in the Oklahoma nursing  
2     act that permits an LPN to perform mental health  
3     assessments?

4           A     No, sir.

5           Q     And I also want to talk about the  
6     differences between an RN and an LPN. Can you  
7     explain to me what those differences are?

8           A     An RN is over the LPNs and everything.  
9     They're in charge of the LPNs, and they -- if we  
10    have a problem, we go to the RNs with them. And we  
11    do about the same thing except they're charging and  
12    stuff like that.

13          Q     When you say "they're charging," what do you  
14    mean?

15          A     They're in charge of L- -- LPNs and see that  
16    we get our tasks done. We -- we have tasks, and she  
17    sees that we get all of our tasks done. If we have  
18    a question, we go to the RN and ask her about the  
19    problem that we have.

20          Q     Kind of a supervisor role?

21          A     Yes.

22          Q     And -- and when you say you go to them when  
23    you have a question, are you given autonomy unless  
24    you have a question?

25          A     I -- I don't understand the question.

1           Q     Because if you perform a use of force  
2     assessment, are you able to perform that entire  
3     assessment without checking out to an RN?

4           A     Yes, sir, most of the time.

5           Q     And same with on an initial intake, are you  
6     able to perform the entire intake without checking  
7     out to an RN?

8           A     Yes, sir.

9           Q     Can you explain to me under the licensing,  
10    what the difference is between an LPN and an RN?

11          A     Not exactly. To me, they've got more  
12    education. Like I say, we do -- we perform about  
13    the same duties except she supervises us and stuff.  
14    I've taken IV therapy classes. So, I do IVs and  
15    draw blood and stuff like that. And, like I say, to  
16    me, she -- she's just a supervisor.

17          Q     And this was while you're talking -- when  
18    you were referring to as -- as a "supervisor,"  
19    you're talking about while you were at Turn Key.

20          A     Yes.

21          Q     And you say while at Turn Key, you guys  
22    performed the same tasks as an RN?

23          A     Yes, sir.

24          Q     Is that the same in other facilities?

25          A     Yes, sir.

1           Q     Now, why -- why would they have a different  
2     set of roles and responsibilities that they're  
3     permitted to do in the Oklahoma nursing act for an  
4     RN versus an LPN?

5           A     I don't know what the RNs, you know -- all I  
6     know is I've worked hospitals, I've worked prisons,  
7     I've worked jails; and we do about the same thing  
8     except they're -- they've got the title, they're  
9     supervisors, they're people that we can go to in  
10    case we have a problem or something.

11          Q     When you are informed that an inmate has had  
12    a altercation with another inmate, are you provided  
13    any training to assess their mental health needs?

14          A     It's just on-the-job trainings -- is what  
15    we've had.

16          Q     And based upon your experience and on the  
17    job, do you believe it is a good practice to perform  
18    mental health assessments, when someone has a past  
19    mental health diagnosis, when they have an  
20    altercation with an inmate?

21                   MR. NARENDRAN: Object to form.

22                   MS. REMILLARD: Same objection.

23          Q     (By Mr. Franseen) You can answer.

24                   MR. NARENDRAN: Go ahead.

25          A     What was the question again, now?

1 MR. FRANSEEN: (Addressing the court  
2 reporter) Do you want to repeat the question?

3 THE COURT REPORTER: Sure.

4 (The record was read as requested.)

5 MR. NARENDRAN: Same --

6 A Yeah.

7 MR. NARENDRAN: -- objection.

8 THE WITNESS: Yeah. Okay.

9 A Yes --

10 MS. REMILLARD: Same.

11 A -- sir.

12 **Q (By Mr. Franseen) And why is that?**

13 A Because we've done it ever since I've --  
14 I've been a nurse. I worked mental health at  
15 High Point, and that's -- all was adolescent kids  
16 and stuff. And they -- they kind of train us --  
17 they trained us to do assessments and stuff like  
18 that.

19 **Q And you -- because one of the things, if**  
20 **someone has a mental health history and past, is**  
21 **when they're acting out, that can be an indication**  
22 **that they're having a crisis event, correct?**

23 MR. NARENDRAN: Object --

24 MS. REMILLARD: Object --

25 A Not --

1 MR. NARENDRAN: -- to form.

2 A -- necessar- --

3 MS. REMILLARD: Same objection.

4 MR. NARENDRAN: All right. Go ahead.

5 A Not necessarily.

6 Q (By Mr. Franseen) Well, when you say "not  
7 necessarily," are you implying that sometimes it can  
8 be and sometimes it's not?

9 A Well, that depends on the person and what  
10 they're doing. I've -- I've seen people act out and  
11 not be mentally ill.

12 Q And if -- what if someone has a past history  
13 of suicidal attempts? Would you want to at least  
14 assess their mental health at that time?

15 A Yes, sir.

16 Q And you would want to do that and document  
17 whether you assessed their mental health if they had  
18 that past history and acted out in that manner?

19 A Yes, sir.

20 Q And that would be important to document  
21 because if it's not documented, there's no proof  
22 that that assessment was performed.

23 MR. NARENDRAN: Object to form.

24 MS. REMILLARD: Same objection.

25 And, for the record, can one objection be

1 sufficient --

2 MR. FRANSEEN: That's fine.

3 MS. REMILLARD: -- for both of us?

4 Thank you.

5 A Yes, sir.

6 Q (By Mr. Franseen) And did you perform the  
7 use of force evaluation related to Krysten Gonzalez  
8 on January 8th, 2019?

9 A Yes, sir.

10 Q Have you reviewed any documents related to  
11 that use of force assessment?

12 A I looked at it the other day.

13 Q And what did you look at? Did it help you  
14 refresh your memory?

15 A I -- I remember that case.

16 Q You remember that case?

17 A I remember that case.

18 Q Did any of the documentation help assist you  
19 in refreshing your mem- -- your memory?

20 A No, sir.

21 Q So, you have an independent recollection of  
22 that event involving Ms. Gonzalez?

23 A Yes, sir.

24 Q Let's start with your first involvement with  
25 her on that date.



1           A       Okay. She came to clinic. They brought her  
2       up to clinic with a inmate-on-inmate. She came in  
3       there. She was laughing, carrying on. I asked her  
4       if she was injured.

5                   She said "no."

6                   She had some scratches on her neck and on  
7       her arm. There was no blood. I cleaned them up,  
8       just wiped them up to -- to be sure that they didn't  
9       have any blood or anything. I again asked her if  
10      she was injured.

11                  She said, "no," she didn't need any medical  
12      service, that she was okay and she was fine, she  
13      wanted to -- she said, "You ought to see the girl  
14      that I fought. I whipped her ass real well."

15           **Q       Anything else go on during that evaluation?**

16           A       No, sir.

17           **Q       Did you review her --**

18           A       I --

19           **Q       -- chart when you performed that evaluation?**

20           A       I looked at her chart, yes. Uh-huh.

21                   (Plaintiff's Exhibit Number 1 marked for  
22      identification and made part of the record.)

23           **Q       (By Mr. Franseen) And I'm going to hand you**  
24      **what's marked as Plaintiff's Exhibit No. 1.**

25           A       Uh-huh.

1 MS. REMILLARD: Thank you.

2 Q (By Mr. Franseen) This is a -- the -- what  
3 has been produced as the Post Use of Force  
4 Assessment for Ms. Gonzalez. Do you recognize that  
5 document?

6 A Yes. It's one of our Post Use of Force.

7 Q When you say "one" of them, are there  
8 different Post Use of Force --

9 A No.

10 Q -- documents?

11 A This is our -- this is our Post Use of  
12 Force.

13 Q So, that's the Turn Key Post Use of Force --

14 A Uh-huh.

15 Q -- Assessment; is that correct?

16 A Uh-huh.

17 Q Is that a "yes"?

18 A Yes, sir.

19 Q And there may be time to time where I  
20 just --

21 A Uh-huh.

22 Q -- make sure it's --

23 A Sorry.

24 Q -- a verbal --

25 A Yeah.

1 Q -- response.

2 Have you given a deposition before?

3 A Yes, sir.

4 Q How many times?

5 A Once -- no, twice.

6 Q Were they involving your care provided at  
7 Turn Key?

8 A No, sir.

9 Q Where were they -- what are -- what were  
10 they related to?

11 A One was at LARC.

12 Q Where was the other one?

13 A I got hit by a pickup; and --

14 Q Okay.

15 A -- so, it was that one.

16 Q When looking at this Use of Force  
17 Assessment, does this include all of the items and  
18 questions that you would have asked Ms. Gonzalez?

19 A Yes, sir.

20 Q Does it properly document all of the inquiry  
21 that you performed and the answers she gave?

22 A Well, I didn't see in there that -- that  
23 she -- what she said about the other patient.

24 Q Okay. So --

25 A Yeah.

1 Q So, outside of that comment --

2 A Yes, sir. Sh- --

3 Q -- that's not documented. But does  
4 everything else -- as far as your interaction with  
5 her, is it documented?

6 A Yes, sir.

7 Q Would --

8 THE COURT REPORTER: If you --

9 Q (By Mr. Franseen) -- you agree --

10 THE COURT REPORTER: -- could -- excuse  
11 me.

12 If you could, wait till he completes his  
13 question --

14 THE WITNESS: Okay.

15 THE COURT REPORTER: -- before you  
16 answer.

17 Thank you.

18 THE WITNESS: Okay.

19 Q (By Mr. Franseen) Would you agree that on  
20 this assessment there is no section that instructs  
21 you to perform a mental health evaluation?

22 A When they -- up here in the left-hand corner  
23 here, they will usually have "mental health" if  
24 they're mental health patients (Indicating).

25 Q (By Mr. Franseen) So, the documentation

1 within Turn Key should indicate on this assessment  
2 that they are mental health if they have been  
3 determined to be mental health.

4 A Yes, sir.

5 Q How does that change your assessment if that  
6 is missing from the me- -- the records?

7 A If she has any indication that she has a  
8 mental problem, then, you know -- the second girl  
9 was crying, carrying on, upset. I asked this  
10 girl -- I -- I asked both of them if they needed to  
11 talk to mental health. I always ask them if they  
12 need to talk to mental health. If they decline --  
13 and this one here said, "No. You ought to see the  
14 other girl."

15 Q That is not what you testified to earlier,  
16 is it?

17 A Well, I don't know.

18 Q When -- when I'm asking you the questions  
19 directed about mental health, are you now saying  
20 that you provided questions for mental health? Is  
21 that correct?

22 A I always ask if they need mental health.

23 Q You did not provide me that answer when I  
24 asked you what you did --

25 A No.

1 Q -- regarding this assessment --

2 A Well --

3 Q -- did you?

4 A -- sorry. I left it out.

5 Q And you also said you -- you sometimes ask  
6 about mental health and you sometimes don't,  
7 depending on the circumstances, correct?

8 A Yes, sir.

9 Q And you also testified that when mental  
10 health is noted on a chart, you change your  
11 assessment, correct?

12 A Yes, sir.

13 Q Have we discussed all of your interaction  
14 with Ms. Gonzalez, regarding your use of force  
15 assessment?

16 A Okay. After -- after I check them to see if  
17 they're okay, we have them sign a waiver that --  
18 that they're not hurt, that they're not injured.  
19 We -- if they don't sign the waiver, the nurse and  
20 the officer can sign the waiver if they refuse to  
21 sign the waiver. Then they take them back to -- to  
22 their cell.

23 I also tell them if you have any problems --  
24 medical problems or anything -- to be sure -- and I  
25 put this down here -- to be sure and let medical

1 know right away (Indicating).

2 Q On that did she -- do you recall whether she  
3 signed that waiver or not?

4 A I don't recall that.

5 Q What does this -- this waiver, does it  
6 include any sort of assessment for mental health?

7 A It just says that they do not need medical  
8 service; that they're not hurt, they're not injured;  
9 that they don't need our -- our service. And then  
10 we tell them -- and it also has on there -- or we  
11 put it on there that if you don't -- if you have any  
12 injuries that you don't know about, then it could  
13 cause -- it could cause headaches, diarrhea, nausea,  
14 vomiting, and everything and even cause death.

15 And that's why I put down here that if you  
16 have any problems, to be sure and let medical know  
17 right away (Indicating).

18 Q Would you agree it's important to have --  
19 ask specific questions regarding mental health when  
20 dealing with a mental-health-assigned patient?

21 MR. NARENDRAN: Object to form.

22 A No. If they don't -- if they don't have any  
23 indications that they are mental health, if it's not  
24 on the chart, no.

25 Q (By Mr. Franseen) Well, Ms. Gonzalez was on

1     **mental health medication. Were you aware of that?**

2           A     No, sir.

3           Q     **Were you aware that she was on Lexapro?**

4           A     No, sir.

5           Q     **Were you aware that she had had past suicide**  
6     **attempts that were in her chart in Turn Key's**  
7     **records?**

8           A     No, sir.

9           Q     **Would that have changed your assessment?**

10          A     No, sir.

11          Q     **Tell me what the -- when it indicates mental**  
12     **health on this Post Abuse (sic) -- Post Use of Force**  
13     **Assessment, how that changes your assessment.**

14          A     If she -- if she showed any indications that  
15     she was mental health, that she was having mental  
16     problems, that would have changed my indication.

17          Q     **If the chart indicated that on at least**  
18     **two prior occasions, she had asked for change to her**  
19     **anxiety meds, would that have changed your**  
20     **assessment?**

21          A     If I could have seen it, but, like I say,  
22     what we -- we -- they bring them in, and we have to  
23     assess them and see what they're doing. She was not  
24     showing any indication that she was mental health.

25          Q     **Can you explain to me, when you said that**



1     **you looked at her chart, what you reviewed?**

2           A       When -- when -- her face sheet comes up.  
3     When we pull them up on the computer, her face sheet  
4     comes up. We see not just the Po- -- it won't say  
5     "Post Use of Force." It will have her name, her  
6     picture and it'll have an alert if she's mental  
7     health and it'll have "MHO" or "severe mental  
8     health" or whatever. That had nothing on her chart  
9     that -- her face sheet that I saw.

10          **Q       Would you agree that someone on mental**  
11     **health medications and with past suicide attempts**  
12     **should have a mental health indication on their**  
13     **chart?**

14                   MR. NARENDRAN: Object to form.

15          A       Not all of them. Just because they're on  
16     the medication doesn't mean that they're mental  
17     health.

18          **Q       (By Mr. Franseen) What if they have had past**  
19     **suicide attempts?**

20          A       That should have been on there. I --

21          **Q       What --**

22          A       -- didn't --

23          **Q       -- if -- what if they were ordered to Mental**  
24     **Health Court and that is why they are being detained**  
25     **at Oklahoma County Detention Center?**

1 A We couldn't see that. I couldn't see that.

2 Q So, there's noth- -- you -- whether you can  
3 see it or not, if someone is being ordered to be  
4 held because they are under Mental Health Court,  
5 should that be noted in their chart and be assigned  
6 in the mental health unit?

7 A We don't have that on any of our charts,  
8 that I know of.

9 Q Well, you do have mental health notations  
10 you can put on your charts.

11 A Yes.

12 Q And, so, that's what I'm asking you. You  
13 can use that designation for anyone who is assigned  
14 to Mental Health Court while they are waiting  
15 placement to an inpatient unit at Oklahoma County  
16 Detention Center.

17 A I don't know if they can put the charges  
18 that -- that she's doing that.

19 Q I'm not asking about the charges. I'm  
20 asking you can all -- put them under the  
21 mental health description that you say can pop up  
22 and be assigned.

23 A We have alerts.

24 Q And that alert can be used if someone is  
25 on -- has been adjudicated to need Mental Health

1 Court.

2 MR. NARENDRAN: Object to form.

3 A I -- I'm -- I don't know. It's never been,  
4 you know -- I don't question what they alert. I --

5 Q (By Mr. Franseen) You do --

6 A I --

7 Q -- your job.

8 A Yeah --

9 Q And --

10 A -- but --

11 Q -- you don't -- you don't question how  
12 they -- how they tell you to do your job. You just  
13 follow your job.

14 A No, sir. I -- if I see somebody that is  
15 upset, crying, showing signs of mental health, I  
16 immediately get them urgent-care mental health.  
17 I -- I flag them to that. She showed no signs of  
18 mental health whatsoever. She showed no signs of  
19 going to commit suicide or anything like that.

20 Q Did you ask her the questions that are under  
21 a mental health evaluation?

22 A No, sir.

23 Q What is your next interaction with  
24 Ms. Gonzalez?

25 A She was hanging in the cell.

1           Q     Can you describe to me where you were when  
2     you received the alert?

3           A     We was getting on the elevator. We had been  
4     to another call.

5           Q     Another call as far as what?

6           A     As a gurney run -- what we call "gurney  
7     runs." Somebody else had had -- supposedly had a  
8     seizure or -- or something. We get down there.  
9     They were okay. So, we were going back to the  
10    elevator.

11          Q     And was -- at this time was medical still on  
12    the 13th floor?

13          A     Yes.

14          Q     And, so, you're going back to the -- and  
15    you -- something comes over the radio? Is that how  
16    this --

17          A     Yes.

18          Q     -- works?

19                Can you explain to me the process of what  
20    you hear --

21          A     Okay.

22          Q     -- and what you do?

23          A     The officers have the radios. We heard,  
24    "Gurney on 6." That's where she was. And, so, we  
25    had just left a different pod -- like, 12 or

1 something like that -- and we were getting on the  
2 elevator and -- the officer, another LPN, and  
3 myself -- with the gurney.

4 So, we run down to 6 with the gurney. We go  
5 over there. The officer's standing at the door.  
6 I'm not sure, exactly, if there was another officer  
7 or what. But, anyway, the other LPN and I went in.  
8 And she was hanging at the end of her bed, a sheet  
9 wrapped around her neck. Ryan picked her up. I  
10 loosened the sheet. We lowered her down. We pulled  
11 her out and started CPR.

12 Q And was the sheet being tied to the top  
13 bunk?

14 A I really don't know where it was tied. I --  
15 probably. I don't know.

16 Q Would that -- based upon her positioning, is  
17 that where you believe that the sheet was tied to?

18 A Yes, sir.

19 Q Did -- so, from the time someone was called  
20 until you arrived, did anyone perform any  
21 life-saving measures for her?

22 A I can't say. I wasn't there.

23 Q No one had lifted her off the bed?

24 A I -- I -- I don't know for sure. There  
25 might have been a officer in there, holding her up.

1 I -- I don't know.

2 Q Would -- if there was an officer -- officer  
3 holding her up, do you -- would you recall that?

4 A I don't know. It all happened so fast.  
5 Once we got there, we just -- we got her down and --

6 Q Do you know whether the facility has any  
7 devices there to cut people down?

8 A They do, but we did not have one --

9 Q Why did you --

10 A -- at the --

11 Q -- not have one?

12 A Because we don't have it on our cart.

13 Q Why does the gurney run not have a device to  
14 cut people --

15 A They had --

16 Q -- down?

17 A -- scissors, but we didn't -- we didn't take  
18 the time to get them out. I mean --

19 Q And -- and I'll just remind you to allow the  
20 questions to fully complete before you start your  
21 answers.

22 A Sorry.

23 Q On each floor are there devices to cut  
24 people down from sheets?

25 A I'm not sure.

1           Q     There have been multiple hangings at  
2     Oklahoma County Detention Center over the years,  
3     hasn't there?

4           A     I'm not sure.

5           Q     When did you first start working at Oklahoma  
6     County Detention Center?

7           A     2018, November 1st.

8           Q     So, you had only been there roughly two -- a  
9     little over two months when this --

10          A     Uh-huh.

11          Q     -- event occurred?

12          A     Yes, sir.

13                 (Plaintiff's Exhibit Number 2 marked for  
14     identification and made part of the record.)

15          Q     (By Mr. Franseen) I'm going to hand you  
16     what's been marked as Plaintiff's Exhibit No. 2.

17          A     Okay. On the above date and approx- --

18                 MS. REMILLARD: Thank you.

19          Q     (By Mr. Franseen) Can you identify that  
20     sheet -- that sheet?

21          A     Yes, sir.

22          Q     Please explain, for the record, what that  
23     sheet is.

24          A     This is a sheet -- this is a report that I  
25     did after we got through with sending her out.

1           Q     And does that sheet seem to mimic what you  
2     provided, as far as your testimony, as what  
3     occurred --

4           A     Yes, sir.

5           Q     -- when you found her?

6                     Is there anything in that statement that  
7     says an officer was holding her up?

8           A     I'm not sure whether the officer was or not.  
9     Like I say, I -- I don't recall. It all happened so  
10    fast. I remember seeing the officer maybe at the  
11    door, maybe. You know, I don't know.

12          Q     Do you recall the name of that officer?

13          A     No, sir.

14          Q     From your recollection, were there specific  
15    areas for mental health that had specific  
16    mental-health psych checks at Oklahoma County  
17    Detention Center?

18          A     Yes, sir.

19          Q     Where were those located?

20          A     On our floor -- for the women, on  
21    13th floor.

22          Q     Where were the men?

23          A     13th floor, down at the other end of the  
24    hall.

25          Q     In a different pod?



1           A       At the -- at this time, some of them was on  
2       our floor; and some of them was -- no, it's -- it  
3       was on the other end of 13th floor, in a different  
4       unit/pod.

5           Q       And did they -- so, they had women in one  
6       section and men in a different section?

7           A       Yes, sir.

8           Q       But both were on 13th floor.

9           A       Yes, sir.

10          Q       How many beds did they have for mental  
11       health at that time?

12          A       For mental health? At that time? They have  
13       a floor -- like, 12th floor has a lot of mental  
14       health patients. On our floor we have -- we have --  
15       let's see. We have 7, 8, 9, 10, 11, 12; but we mix  
16       them up.

17                   What we do is if we get a mental health  
18       pers- -- a SP1 womans (sic) -- women, they go back  
19       in the back of -- like, in Cell 10. From 7 back,  
20       they have for women. The men, we put them on -- we  
21       have two camera cells. But we can put them on some  
22       other -- in some other cells; but usually now they  
23       send them to Char- -- 13 Charlie.

24          Q       That's for SP1?

25          A       For SP1s.

1 Q How many cells are in 13 Charlie?

2 A Ten, I think it is.

3 Q Is there a 13 Alpha?

4 A Yeah, Alpha, David, and Charlie.

5 Q Okay. So, we've got 3 pods on --

6 A Uh-huh.

7 Q -- 13.

8 Is that correct?

9 A Yes.

10 Q And --

11 A We --

12 Q -- is it --

13 A -- had four, counting Baker. We've got  
14 Alpha, Baker, Charlie, and David. The women -- if  
15 they're just mental hea- -- MHOs, mental health,  
16 they go -- go to Apha (sic) -- Alpha on 13th floor.

17 Q What is "MHO"?

18 A "Mental" -- a "Mental Health Observation."

19 Q How often are they checked when they're on  
20 MHO?

21 A The officers do that. I don't know.

22 Q And is that MHO different from SP1 and SP2?

23 A Yes, sir.

24 Q How many beds are available in Alpha while  
25 someone is on MHO?

1 A I'm not sure.

2 Q Do you believe it's 10, 20?

3 A Okay. Let's see. I think there's,  
4 like, 25. I think there's 10 -- 10 or 11 to 25 --  
5 numbers.

6 Q Okay.

7 A So --

8 Q I'm kind of confused when you say that,  
9 yeah.

10 A Okay.

11 Q How many cells do you believe are in  
12 13 Alpha?

13 A Okay. It starts at 11 and goes around, I  
14 think, to 25. I'm not sure. I don't go over there  
15 all that much.

16 Q I think I'm kind of understanding what  
17 you're explaining now. So, the mental health  
18 observation cells start at 11.

19 A Uh-huh, and goes to 25, I think. I'm not  
20 sure.

21 Q And are there one or can there be multiple  
22 detainees in those cells?

23 A They can put two.

24 Q So, roughly, we have maybe 14 to 15 cells?

25 A Yes, sir.

1 Q So, maybe 30 spots for --

2 A Yeah.

3 Q -- MHO?

4 A Maybe. Like I say, I don't go over there.

5 So, I don't know. That's not my --

6 Q We would be able to look at a schematic and  
7 determine, starting at 11, what it goes to and up --

8 A Yeah.

9 Q -- to 2 spots per cell, correct?

10 A Yes.

11 Q And you said Cells 7 to 10 were for SP1?

12 A Yeah, the women on our si- -- on Baker.

13 Q That's on Baker.

14 Is there Cells 1 through 10 on Alpha?

15 A Yes, sir.

16 Q What are those assigned to?

17 A Usually, pregnant women.

18 Q Is it pregnant women and just kind of  
19 general women's health --

20 A Well --

21 Q -- if they're in the wo- -- in the medical  
22 unit?

23 A Yes --

24 Q Okay.

25 A -- I do believe.

1           Q       So, with Baker we've got 7 through 10 are  
2       SP1. What's 1 through 7 on Baker?

3           A       Our sick people. If they have a CPAP, they  
4       have to be up there and -- like I say, just the sick  
5       ones and maybe they're old and frail, maybe -- just  
6       things like that.

7           Q       And on the -- and does it go beyond 10 in  
8       Baker -- the --

9           A       Well --

10          Q       -- number on the --

11          A       -- yes.

12          Q       -- cells?

13          A       Yes. We have 1 through 11. Then we have  
14       20 through 25.

15          Q       What is Nos. 11 through 19? What are those  
16       assigned to?

17          A       11 through 19? Well, ele- -- 11 -- okay.  
18       11 is our female. It can be -- it's not exactly for  
19       SP1s, but we use them for them and sick women.

20                 20 is a -- yeah, 20 and 21 are camera cells.  
21       So, those are SP1s that we have to watch; or it  
22       could be a inmate that is maybe not a SP1, but needs  
23       to be watched or something like that. And then from  
24       22 on down is -- they could be, like, for sick  
25       people for the higher charged people.

1 Q And, so, for Alpha and Baker, have we talked  
2 about all the medical placements that you're aware  
3 of --

4 A Uh-huh --

5 Q -- for --

6 A -- well --

7 Q -- detainees at Oklahoma County Detention  
8 Center?

9 A For -- for sick -- for SP1s and mental  
10 health. Charlie and David are for our  
11 insulin-dependent diabetics and for people who have  
12 wheelchairs, who have -- can't defend themselves --  
13 like, if they have a broken arm, have a cast,  
14 have -- any way that they can't defend themselves.

15 Q So, does Charlie and David have women on  
16 those --

17 A No --

18 Q Oh.

19 A -- just Alpha --

20 Q Okay.

21 A -- and part of Baker.

22 MR. NARENDRAN: Let him get his  
23 question out.

24 THE WITNESS: Oh.

25 MR. NARENDRAN: It's all right. It

1 happens.

2 Q (By Mr. Franseen) So, Charlie and David have  
3 no mental health assignments for women, correct?

4 A No, sir.

5 Q And we've discussed on Alpha and Baker what  
6 the levels are and the number of beds, roughly, for  
7 mental health are on 13 Alpha and Baker.

8 A Yes, sir.

9 Q Are you aware of any other locations that  
10 include mental health observation or SP1 or SP2?

11 A All of 12 -- Floor 12 -- has mental health  
12 patients, as far as I know. I don't go to the other  
13 floors. So, I'm not sure. I know mental health  
14 goes to 12, and I'm not sure which pod it goes to.  
15 All floors have a Alpha, Baker, Charlie, and David.

16 Q Were there any women assigned to cells for  
17 mental health observation on 12?

18 A No. Those are -- as far as I know, they're  
19 all men.

20 Q So, as far as bed placements for mental  
21 healthcare -- women -- there weren't on -- any  
22 on 12.

23 A No, as far as I know.

24 Q Are you aware of any other floors that would  
25 have had mental-healthcare-observation duties for

1 women?

2 A The bottom floor where they bring them in,  
3 we have women's holding; and I think there's -- I'm  
4 not sure about how many cells are there because,  
5 like I say, I don't go there that often; but I think  
6 there's three or four that have -- for -- for  
7 people -- mental health patients sometimes.

8 Q Are there any other locations within the  
9 Oklahoma County Detention Center where women can be  
10 placed on mental health observation?

11 A No, sir --

12 Q Would --

13 A -- well --

14 Q -- you agree --

15 A -- not that I --

16 Q -- that the sixth floor is not a floor that  
17 has mental health observation and duties?

18 MS. REMILLARD: Object --

19 A As far as --

20 MS. REMILLARD: -- to form.

21 A -- I know.

22 MS. REMILLARD: You can answer.

23 A As far as I know.

24 (Plaintiff's Exhibit Number 3 marked for  
25 identification and made part of the record.)



1 Q (By Mr. Franseen) I've got one last exhibit.  
2 It's Plaintiff's Exhibit No. 3. Are you familiar  
3 with this document?

4 MR. NARENDRAN: Thank you.

5 MS. REMILLARD: Thank you.

6 A This is the first time I've seen it.

7 Q (By Mr. Franseen) Okay. First time you've  
8 seen it, but are you familiar with what that is  
9 telling us?

10 A Yes.

11 Q What is that sheet telling us?

12 A This is telling us what the -- suppo- --  
13 somebody times, usually, I'm thinking. It's the  
14 wrong times.

15 Usually, if you -- if you start a code on  
16 somebody or something, you have someone that times  
17 everything that you do; and to me, this is what this  
18 looks like.

19 Q And does it seem to be timing the AED?

20 A It could be. I don't know.

21 Q What are the -- when it -- after it says an  
22 analysis next to a specific time, like "Analysis #1"  
23 or "0" --

24 A Uh-huh.

25 Q -- does it say whether you can shock or not

1     **shock -- after that analysis?**

2           A       Electrode (sic) Placed.

3                   THE COURT REPORTER:   Will you speak  
4     up --

5           A       "Start of" --

6                   THE COURT REPORTER:   -- a little,  
7     please?

8           A       -- "Analysis."

9                   THE COURT REPORTER:   Ma'am, will you  
10    speak up?

11                   THE WITNESS:   I'm just kind of reading  
12    to see.

13          A       It didn't say to shock.

14          Q       **(By Mr. Franseen) It says "No Shock."**

15          A       Yes.

16          Q       **And then after "Analysis #1," what does it**  
17    **state?**

18          A       "Start CPR."

19          Q       **Is this providing "No Shock," as well?**

20          A       "No Shock," yes.

21          Q       **Are you familiar with AEDs, why it -- it**  
22    **states to not provide a shock?**

23          A       I'm fam- -- familiar with them a li- --  
24    yeah.

25          Q       **Did Ms. Gonzalez have a pulse when you**

1 arrived?

2 A No, sir.

3 Q Did she have enough electrical activity to  
4 where an AD- -- -ED machine could be used?

5 MR. NARENDRAN: Object to form.

6 A I don't even remember putting it on.  
7 Mar- -- Ryan might have put it on her. I don't  
8 remember. I just remember that we pulled her out  
9 and started CPR because we had no pulse.

10 Q (By Mr. Franseen) Was she cold to the touch?

11 A She was cool. She wasn't cold.

12 Q She had been hanging there for a while,  
13 hadn't she?

14 MR. NARENDRAN: Object to form.

15 A Not -- I can't determine that. I don't  
16 know.

17 MR. FRANSEEN: No further questions.

18 MR. NARENDRAN: I'll reserve until  
19 trial.

20 MS. REMILLARD: And same with us.

21 MR. NARENDRAN: She'll read and sign.

22 THE VIDEOGRAPHER: And I'm off  
23 videotape record. The time is 10:30 a.m.

24 (Witness excused; signature required.)

25 (Deposition adjourned at 10:30 a.m.)